

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON, MISSISSIPPI**

**JOHN ROBERT SMITH, SHIRLEY HALL  
AND GENE WALKER**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 3:01-CV-855-HTW-DCB**

**DELBERT HOSEMAN, Secretary of State of  
Mississippi; JIM HOOD, Attorney General for the State of  
Mississippi; HAYLEY BARBOUR, Governor of the State  
of Mississippi; MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE; and, MISSISSIPPI DEMOCRATIC  
EXECUTIVE COMMITTEE**

**DEFENDANTS**

**and**

**BEATRICE BRANCH, RIMS BARBER,  
L.C. DORSEY, DAVID RULE,  
JAMES WOODWARD, JOSEPH P. HUDSON  
and ROBERT NORVEL**

**INTERVENORS**

**CONSOLIDATED WITH**

**KELVIN BUCK, ET AL.**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 3:11-CV-717-HTW-LRA**

**HALEY BARBOUR, ET AL.**

**DEFENDANTS**

**RESPONSE OF THE MISSISSIPPI SECRETARY OF STATE  
TO PROPOSED INTERVENORS' MOTION TO INTERVENE**

Mississippi Secretary of State Michael Watson respectfully requests the Court deny the Motion of the proposed Intervenor, Hester Jackson McCrary, Kelly Jacobs, and non-profit Mississippi Early Voting Initiative, to Intervene (Doc. 133) in this action. Because their Motion should be denied, their Rule 60(b)(6) Motion to Amend the Final Judgment of February 26, 2002, as Amended December 30, 2011, should be denied as moot.

In support of this Response, Secretary Watson is submitting simultaneously with this response a supporting brief, and incorporates all of the arguments stated in it as if fully stated here. Secretary Watson additionally adopts and incorporates the arguments made by the other parties opposing the intervention.

ACCORDINGLY, Secretary Watson respectfully requests the Court to deny the proposed Intervenor's Motion to Intervene (Doc. 133) in this action. Because their Motion should be denied, Secretary Watson also respectfully requests their Rule 60(b)(6) Motion to Amend the Final Judgment of February 26, 2002, as Amended December 30, 2011, be denied as moot. Secretary Watson requests any other relief the Court deems appropriate.

Respectfully submitted,

**MICHAEL WATSON,**  
**Secretary of State of Mississippi**

By: /s/ William Trey Jones, III

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**ATTORNEY FOR MICHAEL WATSON,**  
**SECRETARY OF STATE OF MISSISSIPPI**

**CERTIFICATE OF SERVICE**

I, William Trey Jones, III hereby certify that I electronically filed the above and foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

Dated: November 22, 2021

/s/ William Trey Jones, III